

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

AUGUST WILDMAN, et al.,

Plaintiffs,

v.

DEUTSCHE BANK AKTIENGESELLSCHAFT,
DEUTSCHE BANK UK, DEUTSCHE BANK AG,
DUBAI BRANCH, DEUTSCHE BANK AG, NEW
YORK BRANCH, DEUTSCHE BANK TRUST
COMPANY AMERICAS, STANDARD
CHARTERED BANK, STANDARD CHARTERED
PLC, STANDARD CHARTERED BANK LIMITED,
STANDARD CHARTERED BANK (PAKISTAN)
LIMITED, STANDARD CHARTERED BANK,
DUBAI MAIN BRANCH, DANSKE BANK A/S,
DANSKE MARKETS INC., PLACID NK
CORPORATION d/b/a PLACID EXPRESS, and
WALL STREET EXCHANGE LLC,

Defendants.

21 Civ. 4400 (KAM) (RML)

**STIPULATION AND [PROPOSED] ORDER REGARDING
SERVICE AND PRELIMINARY SCHEDULING MATTERS**

This Stipulation is entered into between defendants Deutsche Bank Aktiengesellschaft; Deutsche Bank Trust Company Americas (together, “Deutsche Bank Defendants”); Standard Chartered Bank; Standard Chartered PLC; Standard Chartered Bank (Pakistan) Limited (together, “Standard Chartered Defendants”); Danske Bank A/S; Danske Markets Inc. (together, “Danske Bank Defendants”); and Placid NK Corporation d/b/a Placid Express (“Placid Express”) (collectively, “Stipulating Defendants”) and plaintiffs August Wildman, *et al.* (“Plaintiffs”), through their undersigned counsel.

WHEREAS, Plaintiffs filed this action on August 5, 2021;

WHEREAS, certain of the defendants have been served with the Summons and Complaint in this matter and/or a Notice of a Lawsuit and Request to Waive Service, and all Stipulating Defendants have agreed to accept service as provided herein and subject to the terms and conditions of the stipulation below;

WHEREAS, defendant Wall Street Exchange LLC has not been served with the Complaint or otherwise appeared in this matter. The parties to this Stipulation include all parties to this action other than Wall Street Exchange LLC;

WHEREAS, Plaintiffs and Stipulating Defendants have agreed that it will save judicial and party resources to avoid delay, expense and any disputes relating to service of the Summons and Complaint in this action and to establish a common deadline for Stipulating Defendants to answer or otherwise respond to the complaint pursuant to the coordinated schedule outlined in the stipulation below;

WHEREAS, neither Plaintiffs nor Stipulating Defendants previously have requested or received time for an extension to answer or otherwise respond to the complaint in this action;

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and Stipulating Defendants, through their undersigned counsel, as follows:

1. Stipulating Defendants' shall answer, submit a pre-motion letter, or otherwise respond to the complaint by October 29, 2021.
2. The Stipulating Defendants hereby waive service of the Summons and Complaint in this action and any defense based upon the sufficiency of service of process or any requirement to provide and/or serve translated copies of the Summons and Complaint, provided, however, that no other defense of the Deutsche Bank Defendants, Standard Chartered

Defendants, Danske Bank Defendants, and Placid Express to the claims in this action, including but not limited to defenses based upon lack of personal or subject matter jurisdiction, lack of standing, improper venue or a defendant having been improperly named, is prejudiced or waived by the execution of, agreement to, or filing of this stipulation, or by the agreement to accept service of the Summons and Complaint.

Dated: October 5, 2021

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By:/s/ Ryan R. Sparacino

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*Attorney for Defendant Placid NK Corporation
d/b/a Placid Express*

SO ORDERED.

Date: _____
Brooklyn, New York

The Honorable Kiyo A. Matsumoto
United States District Judge